

# **EXHIBIT 1**

**DECLARATION OF SCOTT DE HAAS**

I, Scott de Haas, hereby declare as follows:

1. My name is Scott de Haas. I am a citizen of the United States and am at least eighteen years of age. I have personal knowledge of and am competent to testify as to the facts herein.

2. I have been an employee at Roku, Inc. since 2011. I am currently Senior Vice President of Product Engineering and Operations.

3. I am informed and understand that MV3 alleges that Roku infringes U.S. Patent No. 8,863,223, because Roku products perform casting and mirroring functions to allow content from a mobile device to be shown on another display.

4. Roku is a Delaware corporation with its headquarters and principal place of business in Los Gatos, California. Roku also has offices located in Los Gatos, California, Austin, Texas, Boston, Massachusetts, Chicago, Illinois, New York, New York, Cambridge, United Kingdom, Denmark, Netherlands, and China. As of February, 2018, Roku employed 1152 employees, and Roku's Los Gatos headquarters was home to 753 of those employees.

5. In my role as SVP of Product Engineering and Operations, I manage a team of 327 employees located across the globe (Los Gatos, California, Austin, Texas, Shanghai China, Cambridge, United Kingdom, and Aarhus, Denmark). I am familiar with Roku's research and development, engineering, design, marketing, distribution, and sale of its products. My base office is now located in Austin, Texas. In order for me to carry out my job responsibilities I travel between the various Roku offices.

6. Roku's marketing personnel are headquartered in Los Gatos, California. The staff for U.S. marketing solely resides Los Gatos, California. Marketing documents not stored electronically are almost exclusively stored at Roku's headquarters.

7. Roku's sales and distribution personnel are headquartered in Los Gatos, California. In addition, there are sales representatives located in different places throughout the United States near particular customers. None of Roku's sales representatives are located in Texas. Instead, they are located in Maryland, Ohio, Florida, Minnesota, California, and the United Kingdom. All sales personnel, other than the few representatives located near customers in the United States, are located in Los Gatos. Sales, distribution, and financial documents not stored electronically are almost exclusively stored at Roku's headquarters.

8. Roku's engineering of the casting and mirroring functions allowing content from a mobile device to be shown on another display is headquartered in Los Gatos, California, and, but for one employee that resides in Reno, Nevada, occurs in Los Gatos, California. Specifically, this functionality is the exclusive responsibility of Roku's Wi-Fi team and media teams. The Wi-Fi and media teams include both software and hardware engineers, and these teams are located in Los Gatos, with the exception of the employee working remotely from his home in Reno. Engineering documents associated with the Wi-Fi and media teams not stored electronically are almost exclusively stored at Roku's headquarters.

9. Roku also has research and development facilities in Los Gatos, California, Austin, Texas, Cambridge, United Kingdom, and Aarhus, Denmark. Roku's Austin facility employs TV engineers. These TV engineers do not work on casting and mirroring functions that can be carried out using Roku technology to allow content from a mobile device to be shown on another display.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Dated: 2/27/19

A handwritten signature in black ink, consisting of a large, stylized 'S' followed by a cursive 'de Haas'.

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Scott de Haas